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1 **Q. WHAT WERE YOUR DUTIES AS GENERAL MANAGER – GAS**
2 **CONTROL & OPERATIONS PLANNING FOR SCPC?**

3 A. During the period under review, my areas of responsibility for SCPC
4 included the gas control department which monitored system conditions to ensure
5 the safe reliable operation of the pipeline to meet firm contract commitments;
6 operations planning which coordinated with field operations for planned pipeline
7 outages for construction and maintenance activities as well as planning for near
8 term operating conditions on the pipeline to meet firm contract commitments; gas
9 measurement group which handled administrative activities associated with gas
10 measurement such as assuring that all measurements were collected and met
11 validation criteria; and transportation scheduling department which assisted
12 shippers with moving gas on the pipeline.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of my testimony is to discuss, for the period under review,
15 SCPC's portfolio of gas supply service options. Specifically, I discuss the various
16 gas supply options that were available to SCPC, and the gas supply options
17 implemented by SCPC. I also discuss the transportation and storage assets used
18 by SCPC to provide natural gas services to SCPC's firm customers during the
19 period under review. Finally, I discuss the various types of contracts that were
20 available to SCPC in establishing its gas portfolio.

1 **Q. WHAT GAS SERVICE OPTIONS WERE AVAILABLE TO SCPC**
2 **DURING THE PERIOD UNDER REVIEW?**

3 A. There were four gas service options available to SCPC. The gas service
4 options were (1) wellhead gas supply; (2) underground storage; (3) pipeline
5 transportation; and (4) liquefied natural gas ("LNG"). These options were
6 available through the three (3) interstate pipelines connected to SCPC's system, on
7 two of which SCPC held firm transportation contracts, as well as SCPC's on-
8 system LNG facilities.

9 **Q. PLEASE DESCRIBE SCPC'S GAS SUPPLY PORTFOLIO.**

10 A. SCPC's gas supply portfolio included each service option discussed above,
11 and SCPC combined these services to meet its firm demand under varying weather
12 conditions at a reasonable cost. At January 1, 2006, SCPC had fifteen (15) firm
13 wellhead contracts for a maximum daily quantity of 170,000 dekatherms ("Dt")
14 per day. Spot wellhead purchases were also made as required to meet system
15 needs. Additionally, SCPC planned to avoid any carry over gas supply contracts
16 into the SCPC/SCG post merger time period. This objective was accomplished by
17 the November 1, 2006 merger effective date.

18 **Q. PLEASE DESCRIBE SCPC'S UPSTREAM FIRM TRANSPORTATION**
19 **CAPACITY CONTRACTS AS WELL AS ITS STORAGE CONTRACTS.**

20 A. At January 1, 2006, upstream firm transportation capacity contracts totaled
21 287,714 Dt per day on the two (2) interstate pipelines that provided service
22 directly to SCPC: Southern Natural Gas Company ("Southern") and

1 Transcontinental Gas Pipe Line Corporation ("Transco"). Production area
2 underground storage contracts totaled 6,515,450 Dt of storage capacity. The
3 maximum injection and withdrawal quantity for these contracts totaled 47,295 Dt
4 per day and 124,978 Dt per day, respectively. Market area underground storage
5 contracts totaled 86,564 Dt of storage capacity and maximum injection and
6 withdrawal quantity of 506 Dt per day and 3,524 Dt per day, respectively. Exhibit
7 No. __ (MPW-1) provides a summary of the firm transportation and underground
8 storage maximum daily capacity by pipeline supplier.

9 SCPC's on-system LNG facilities had a total storage capacity of 1,880,000
10 Mcf. The maximum liquefaction rate for these LNG plants was 6,000 Mcf and
11 assuming the ability to achieve 100% nameplate capacity, the maximum
12 vaporization rate was 150,000 Mcf. While these facilities had the nameplate
13 capability to vaporize 150,000 Mcf/day, SCPC used them to provide an LNG
14 peaking service with a planned vaporization of 105,000 Mcf/day.

15 **Q. AS PART OF THE MERGER, DID SCPC TRANSFER THIS CAPACITY?**

16 Yes. Concurrent with the effective date of the merger, SCPC permanently
17 released its firm transportation and storage contracts to SCPC's former resale
18 customers under the terms of the settlement filed with the Federal Energy
19 Regulatory Commission ("FERC") in SCPC/SCG's merger application which was
20 supported by SCPC's customers and the South Carolina Office of Regulatory
21 Staff.

1 **Q. PLEASE DESCRIBE THE WELLHEAD GAS SUPPLY OPTION.**

2 A. Natural gas wells generally produce natural gas at a constant rate year-
3 round, and SCPC possessed the ability to purchase a supply of natural gas directly
4 from the wellhead. Once SCPC purchased a supply of wellhead gas, the interstate
5 pipeline company then transported the gas directly to SCPC's system. As will be
6 discussed more fully below, SCPC had the option to purchase wellhead gas on a
7 firm or spot basis.

8 **Q. PLEASE DESCRIBE THE UNDERGROUND STORAGE OPTION.**

9 A. After purchase, some wellhead gas may be stored in underground facilities
10 located nearer the wellheads or closer to the consumer markets. Depending upon
11 location, these underground facilities are referred to as either production area
12 storage or market area storage. Gas stored in these underground facilities was
13 available for withdrawal and delivery to SCPC's system during periods of high
14 demand. Additionally, SCPC could inject and withdraw gas from these facilities
15 in order to "balance" the system on a daily basis.

16 Typically, underground storage facilities operate on an annual cycle.
17 During the summer months, the storage is filled, and in the winter months, the
18 storage is withdrawn. Underground storage is withdrawn at a much faster rate
19 than it can be refilled. Additionally, as gas in storage decreases, the rate at which
20 gas can be withdrawn decreases. Further, as the quantity of gas in storage
21 increases, it becomes more difficult to inject gas into storage and the rate of
22 injection decreases. Accordingly, both injection and withdrawal quantities ratchet

1 (the reduced ability to withdraw or inject gas into storage) and decline with
2 increasing or decreasing storage inventory levels respectively.

3 **Q. WHERE DID SCPC TYPICALLY STORE ITS GAS AFTER PURCHASE?**

4 A. During the period under review, SCPC maintained contract storage with the
5 interstate pipelines at the following facilities: Southern's storage located in Prarie
6 County, Mississippi (Muldon Storage Field) and Bienville Parrish, Louisiana
7 (Bear Creek Storage Field); and Transco's storage located in St. Landry Parrish,
8 Louisiana (Washington Storage Field); Covington County, Mississippi (Eminence
9 Storage Field); Potter & Clinton Counties, Pennsylvania (Wharton/Leidy Storage
10 Fields known as GSS); and Carlstadt County, New Jersey (LNG Service facility).

11 These storage assets allowed the Company to flow additional volumes of gas into
12 SCPC's system when needed. They also allowed SCPC to balance wellhead
13 supply with system load requirements, thereby mitigating the potential for
14 imbalance charges. In aggregate, as reflected on Exhibit No. ____ (MPW-2), the
15 Company subscribed to 6,602,014 million Dt of interstate storage capacity.

16 **Q. WHAT INTERSTATE STORAGE ASSETS WERE AVAILABLE TO THE**
17 **COMPANY TO AID IN DELIVERING RELIABLE AND SECURE GAS**
18 **SERVICE TO SOUTH CAROLINA CUSTOMERS?**

19 A. The Company subscribed to 5,167,164 Dt of storage on Southern's system,
20 with maximum daily withdrawal capability from this storage equaling 104,337 Dt
21 per day at peak storage inventory and maximum daily injection capability of
22 39,747 Dt per day. On Transco, SCPC subscribed to 1,434,850 Dt per day of

1 storage, with a maximum withdrawal quantity of 24,165 Dt per day of which
2 20,641 Dt per day could have been delivered within firm transportation service
3 and 3,524 Dt per day in addition to firm transportation service. The maximum
4 daily injection capability into Transco storage was 8,054 Dt per day. Exhibit No.
5 ___ (MPW-2) reflects total storage and withdrawal capacity in a table format.

6 **Q. PLEASE DESCRIBE THE LNG OPTION.**

7 A. As Mr. Dozier stated in his direct testimony, SCPC had two LNG facilities,
8 one at Bushy Park near Charleston and the other at Salley, in Orangeburg County.
9 The Bushy Park facility was able to liquefy and store up to 980,000 Mcf of LNG,
10 while Salley could store up to 900,000 Mcf of trucked-in LNG. Exhibit No. ___
11 (MPW-2) attached hereto sets forth the operational capacity of the LNG storage
12 facilities at Bushy Park and Salley, and shows the combined capacity of these
13 LNG facilities during the period under review.

14 SCPC's intrastate LNG storage provided service from facilities directly
15 connected to the Company's system and was normally used for needle peak
16 demand, which is the last increment of demand on the coldest hours or days of the
17 winter. This on-system LNG service significantly added to the reliability and
18 security of gas supply during unfavorable operating conditions that may occur
19 from time to time. For example, SCPC's supply of gas could have been
20 unexpectedly interrupted because of a hurricane in the Gulf, or because
21 abnormally cold weather created a spike in demand which in turn may have
22 caused equipment malfunctions, well freeze-ups, and other operational

1 abnormalities thereby limiting the supply of gas into South Carolina. In these
2 types of instances, SCPC had the ability to employ the use of its on-system LNG
3 facilities for a limited time to offset any adverse effects caused by an upstream
4 interruption.

5 Again, as part of the Settlement filed with FERC in SCPC/SCG's merger
6 application, SCPC agreed to sell its ownership in these two LNG facilities to
7 SCE&G and in compliance with state regulations for the transfer of plant between
8 regulated utilities. The transfer of ownership took place on the last day of October
9 2006.

10 **Q. WHY DID SCPC FIND IT NECESSARY TO STORE GAS FOR LATER**
11 **USE?**

12 A. In SCPC's merchant role, the storage of natural gas was both a beneficial
13 and critical function to the operation of SCPC's gas transmission system. Storage
14 primarily served as an available supplement of gas to SCPC's existing wintertime
15 wellhead gas supplies. However, storage also served other useful purposes. For
16 example, storage provided added reliability to the system in the event a disruption
17 occurred in SCPC's wellhead supplies. Moreover, SCPC's on-system LNG
18 storage provided an added measure of reliability for interstate capacity disruptions
19 because interstate pipeline outages have no effect upon LNG storage.

20 Storage also allowed SCPC to "balance" daily differences between the
21 quantities of wellhead gas purchased and the quantities of wellhead gas consumed
22 by SCPC's customers. Additionally, because wellhead gas purchases seldom

1 match a customer's usage from one day to the next, storage acted as a supplement
2 to wellhead gas purchases in the event a customer's daily consumption of gas
3 exceeded SCPC's wellhead gas purchases for that day. Conversely, storage
4 absorbed any unused wellhead gas purchases in the event a customer used less gas
5 than actual wellhead gas purchases.

6 Finally, in some instances, storage provided a price benefit to SCPC and its
7 customers. For example, by storing gas during summer months when natural gas
8 prices are usually at their lowest, SCPC was able to reduce the quantity of
9 wellhead gas purchases required during the winter when wellhead gas prices are
10 traditionally at their highest due to high demand.

11 **Q. HOW DID SCPC UTILIZE ITS COMBINED INTERSTATE STORAGE**
12 **AND INTRASTATE LNG TO ENSURE RELIABLE AND SECURE GAS**
13 **SERVICE?**

14 A. There are two dimensions to storage services: peak capability and duration.
15 SCPC used its storage to address both of these dimensions. Certain storage
16 services are geared toward providing large withdrawal quantities to meet spikes in
17 demand on very cold days but only for a short period of time. The storage
18 services in SCPC's portfolio of this type included Transco LNG, Transco ESS and
19 both the Bushy Park and Salley LNG facilities located on SCPC's system.
20 Accordingly, these storage services provided SCPC with peak capability.

21 Other storage services are geared toward meeting demand over more of the
22 winter period and not only on the coldest days. The storage services in SCPC's

1 portfolio of this type include Transco WSS, Transco GSS and Southern's CSS.
2 Therefore, these storage services provided SCPC with duration capability.
3 Through the active management of all these assets, SCPC was able to meet the
4 needs of its firm customers on the coldest days of the winter and over the entire
5 winter.

6 **Q. PLEASE DESCRIBE THE AVAILABLE INTERSTATE PIPELINE**
7 **TRANSPORTATION OPTION.**

8 A. SCPC contracted for interstate pipeline transportation capacity on both a
9 firm and interruptible basis.

10 Interstate Firm Transportation ("FT") service permits the customer access
11 to the interstate pipeline transportation capacity on a priority basis. On the other
12 hand, interstate Interruptible Transportation ("IT") service is only available when
13 pipeline FT customers, such as SCPC, are not using their FT capacity. IT service
14 is curtailed when FT customers use their capacity. In other words, FT and IT
15 services use the same physical pipeline capacity, with FT service having priority.
16 SCPC contracted for FT service from the pipelines to ensure delivery of natural
17 gas during colder periods when the full transportation capacity of the pipeline was
18 used.

19 The FT service contract demand volume, which provides priority to the use
20 of the interstate pipeline capacity, determined the fixed cost of gas transportation
21 service to SCPC under the interstate pipeline company's rates filed with and
22 approved by FERC. This fixed cost was paid every month regardless of the

1 quantity of gas actually transported by SCPC. Additionally, the interstate pipeline
2 companies had a variable charge associated with each Dt of gas transported by
3 them on behalf of SCPC. This cost increased or decreased monthly depending
4 upon usage.

5 **Q. PLEASE DESCRIBE THE CONSIDERATIONS EVALUATED BY SCPC**
6 **IN ASSEMBLING ITS GAS SUPPLY PORTFOLIO.**

7 A. The Company began its evaluation by reviewing the gas supply, storage,
8 transportation, and other assets already under contract. Other considerations
9 included such things as geographical delivery limitations, maximum volumes,
10 storage ratchets, must-take volumes, and the cost of the various services. SCPC
11 then compared the resources to the varying weather conditions. Finally, the
12 Company determined whether additional resources were required under the
13 varying weather conditions.

14 **Q. PLEASE DESCRIBE THE USE OF EACH OF THESE VARIOUS**
15 **SERVICES WITHIN THE PORTFOLIO.**

16 A. SCPC placed different levels of reliance on its various supply sources based
17 on the time of year in question. In the early part of the winter, SCPC sought to use
18 its wellhead gas as its principal supply. To the extent that wellhead gas was not
19 sufficient, SCPC then would use the natural gas stored in underground storage
20 facilities in descending order of the duration of their supply capability. Lastly,
21 SCPC would use on-system LNG to meet the last increment of demand on the
22 coldest days or hours of the year.

1 As the winter progressed, this order of usage may have been modified
2 under certain circumstances to take advantage of economic opportunities. For
3 example, if South Carolina experienced mild weather during the early part of the
4 winter and storage inventories were relatively high, then underground storage
5 withdrawals may have been used instead of wellhead supply.

6 **Q. WOULD YOU ELABORATE FURTHER ON VARIOUS WEATHER**
7 **CONDITIONS CONSIDERED IN THE PLANNING PROCESS?**

8 A. Yes. Winter weather in South Carolina is highly volatile. Temperatures
9 may range from unseasonably warm to frigidly cold in a very short period. In
10 addition, weather in a winter month such as January may change dramatically
11 from year to year. Exhibit No. ____ (MPW-3) provides the actual heating degree
12 days for the Columbia area for each January from 1956 through 2005.

13 **Q. PLEASE DESCRIBE A HEATING DEGREE DAY.**

14 A. Heating degree day is an industry accepted measure of the potential heating
15 demands that weather conditions create. Simply stated, a heating degree day is a
16 comparative measure of cold weather.

17 In order to calculate the number of heating degree days experienced in a
18 twenty-four (24) hour period, simply subtract the average temperature for a
19 twenty-four (24) hour period from sixty-five (65) degrees Fahrenheit.
20 Accordingly, the result of this calculation is the total number of heating degree
21 days experienced during that particular twenty-four (24) hour period. The greater

1 the number of heating degree days experienced, the colder the weather during that
2 period.

3 **Q. HOW DOES THIS TYPE OF WEATHER VARIATION AFFECT GAS**
4 **SUPPLY REQUIREMENTS?**

5 A. The volatility of winter weather in South Carolina required SCPC to
6 maintain a flexible gas services portfolio. The portfolio had to be capable of
7 meeting both large swings in firm demand from day to day within the winter
8 season, and swings over a winter season, which can range from warmer than
9 normal to colder than normal.

10 **Q. PLEASE DESCRIBE SCPC'S WELLHEAD GAS SUPPLY CONTRACTS.**

11 A. SCPC entered into firm long-term contracts for gas supply at the wellhead
12 with various producers and marketers. At January 1, 2006, SCPC had fifteen firm
13 wellhead supply arrangements under contract or under negotiation. The contracts
14 were for varying amounts of flowing gas and had expiration dates which prevented
15 any contracts from carrying over into the post-merger time period. The prices
16 under most of SCPC's contracts were based on monthly spot prices; however,
17 SCPC had the option to negotiate a monthly price using various benchmark prices.
18 The commodity price represents the value of spot gas in the market and the
19 reservation fee is based on the length of the firm supply commitment and the take
20 flexibility. The volumes under contract represent purchases from major oil and
21 gas producers, independent producers, and national marketers. During the review

1 period, SCPC utilized three types of firm supply contracts: baseload, take-or-
2 release and daily flexibility.

3 **Q. PLEASE DESCRIBE A FIRM BASELOAD CONTRACT.**

4 A. A baseload contract is the least flexible supply contract. Under this
5 contract, the supplier had an obligation to furnish gas and SCPC had an obligation
6 to purchase the contract quantity every day for the term of the contract. Suppliers
7 like these types of contracts because they best match the operating characteristics
8 of gas wells which produce gas at relatively consistent levels and do not require
9 much management of the supply source.

10 **Q. PLEASE DESCRIBE FIRM CONTRACTS WITH TAKE-OR-RELEASE**
11 **FLEXIBILITY.**

12 A. Take-or-Release flexibility allowed SCPC to know that it had a firm supply
13 of gas across the winter period much like baseload gas contracts but also provided
14 the additional right to not take gas for the month. As an example, a Take-or-
15 Release contract for 10,000 Dts for the period November to March would allow
16 the Buyer to exercise the right to "take" 10,000 Dts for November and for
17 December to "take" 8,000 Dts and "release" the remaining 2,000 back to the
18 supplier and in March to "release" the entire 10,000 Dts back to the supplier.

19 **Q. PLEASE DESCRIBE FIRM CONTRACTS WITH DAILY FLEXIBILITY.**

20 A. Daily flexibility allowed SCPC to nominate for delivery a quantity of gas
21 between zero and the daily contract maximum each day. This type of contract
22 allowed SCPC to respond to both increases and decreases in demand within the

1 same delivery month. These types of contracts require more management by the
2 supplier again because gas wells produce at relatively consistent levels.

3 **Q. ARE THERE OTHER TERMS ASSOCIATED WITH FIRM GAS SUPPLY**
4 **CONTRACTS?**

5 A. Yes. Beyond take flexibility provisions as described above, gas supply
6 contracts typically include performance standards, penalty provisions, reservation
7 fees, and other miscellaneous terms. Each provision affects the value of the
8 contract in the portfolio.

9 **Q. PLEASE DESCRIBE A SPOT PURCHASE.**

10 A. In a spot purchase, the buyer agrees to buy and the seller agrees to sell on a
11 best effort basis. Generally, if the buyer and seller agree on a volume and price,
12 the sale is effective for a specific period or until either party chooses to end the
13 arrangement.

14 **Q. DID SCPC MAKE SPOT GAS PURCHASES AS PART OF ITS**
15 **PORTFOLIO?**

16 A. Yes. SCPC had the ability to purchase spot gas from approximately forty-
17 three (43) different suppliers.

18 **Q. WHAT REQUEST DO YOU HAVE OF THE COMMISSION IN THIS**
19 **PROCEEDING?**

20 A. During the period under review, SCPC contracted for sufficient supplies of
21 natural gas and provided reliable service to its customers. At no time during the
22 period under review was SCPC forced to curtail gas service to any of its firm

1 service customers. SCPC adequately maintained gas, storage, and transportation
2 assets for its system during the period under review at levels that were prudent and
3 reasonably met the reliability and service needs of the system. It is my opinion
4 that SCPC's management of these assets during the period under review has been
5 prudent and reasonable. Therefore, I respectfully request the Commission find
6 that SCPC's cost for gas purchases and asset management were reasonable and
7 prudent for this final period under review.

8 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

9 A. Yes.

South Carolina Pipeline Corporation
Firm Transportation and Storage Contracts Available During the Review Period

		Maximum Firm Transportation Dt/Day	Production Area Storage Maximum Withdrawal Dt/Day	Market Area Storage Maximum Withdrawal Dt/Day	Expiration Date
Southern					
FSNG214-1 FT	Firm Transportation	44,650			October 31, 2010
FSNG214-2 FT	Firm Transportation	22,684			October 31, 2010
FSNG214-3 FT	Firm Transportation	5,105			October 31, 2010
FSNG214-4 FTNN	Firm Transportation	84,521			October 31, 2010
FT	Firm Transportation	34,988			October 31, 2010
	CSS		102,100		August 31, 2010
	CSS		2,237		August 31, 2010
Transco					
.3704 Z1 - Z5	Firm Transportation	5,155			December 31 2008
.3704 Z2 - Z5	Firm Transportation	7,582			December 31 2008
.3704 Z3 - Z5	Firm Transportation	5,762			December 31 2008
.3704 Z3 - Z5	Firm Transportation	11,827			December 31 2008
2.0764 Station 65 (Sunbelt)	Firm Transportation	55,977			October 31, 2017
2.0764 Station 85 (Sunbelt)	Firm Transportation	9,463			October 31, 2017
	WSS		15,221		March 31, 2008
	ESS		5,420		October 31, 2013
	GSS			791	March 31 2013
	GSS			663	See Note 1
	LGA			2,070	October 31, 2016
Company Owned LNG				153,150	
Totals		287,714	124,978	156,674	

Note 1: Service is being provided under NGA authority

INTERSTATE STORAGE AND LNG STORAGE

I. Interstate Storage

Pipeline	Type	MSQ	MDWQ
Southern	CSS	5,167,164	104,337
Transco	ESS	54,536	5,420
Transco	GSS	43,409	791
Transco	GSS	32,805	663
Transco	WSS	1,293,750	15,221
Transco	LNG	10,350	2,070
Total Transco		1,434,850	24,165
Total Interstate		6,602,014	128,502

II. SCPC On-System LNG

(in mcf)	SCPC	LNGS	1,880,000	150,000 ¹
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Note: All values are stated in Dt, unless otherwise noted

¹ The LNG facilities had a nameplate capability to vaporize 150,000 Mcf per day. SCPC used these facilities to provide an LNG peaking service with a planned vaporization of 105,000 Mcf per day.

ACTUAL COLUMBIA HEATING DEGREE DAYS

YEAR	JANUARY
1956-57	531
1957-58	766
1958-59	630
1959-60	603
1960-61	728
1961-62	620
1962-63	726
1963-64	640
1964-66	592
1965-66	759
1966-67	554
1967-68	732
1968-69	683
1969-70	823
1970-71	602
1971-72	429
1972-73	618
1973-74	199
1974-75	417
1975-76	662
1976-77	901
1977-78	850
1978-79	664
1979-80	641
1980-81	809

YEAR	JANUARY
1981-82	748
1982-83	739
1983-84	717
1984-85	792
1985-86	731
1986-87	657
1987-88	780
1988-89	469
1989-90	393
1990-91	571
1991-92	574
1992-93	509
1993-94	687
1994-95	596
1995-96	655
1996-97	567
1997-98	512
1998-99	485
1999-00	672
2000-01	645
2001-02	537
2002-03	700
2003-04	661
2004-05	514
2005-06	433

Average	630
Minimum	199
Maximum	901
Last 30 Years	640